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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CATHERINE ANN ORCUTT,	)	
	)	
Plaintiff,	)	CASE NO.
	)	2:22-cv-01870-BNW
v.	)	
	)	<b>SECOND UNOPPOSED MOTION</b>
	)	<b>FOR EXTENSION OF TIME TO FILE</b>
KILOLO KIJAKAZI, ACTING	)	<b>PLAINTIFF'S BRIEF</b>
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	
	)	

Plaintiff by her attorney, moves for a fourteen (14) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed July 24, 2023. This is Plaintiff's second request for an extension of time in this matter. On May 23, 2023, this Court granted Plaintiff's first Motion for an Extension of Time (Dkt. No. 19).

Counsel requests this extension due to two briefing attorneys in Counsel's office going out on unexpected, prolonged, medical leaves within the last two months. These leaves necessitated a complete reorganization of the attorney's schedules. Further, Counsel has explored the possibility of reassignment of this matter, but is unable to do so due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between July 21, and August 4, 2023, staff in Counsel's

1 office have sixty-three (63) Plaintiff briefs due. This figure does not include Oral Arguments,  
2 appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks  
3 which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's  
4 Counsel to properly prepare the brief by the current deadline. This request will not cause  
5 Defendant any undue hardship. This extension is needed to thoroughly and properly prepare the  
6 brief by the current deadline.  
7

8 Wherefore, Plaintiff requests an extension from July 24, 2023, up to and including  
9 August 7, 2023 to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel  
10 who kindly has no objection to this request.  
11

12 Dated July 18, 2023.

13 Respectfully submitted,

14 /s/Hal Taylor  
15 Hal Taylor, Esq.

16  
17 **Plaintiff's Certificate of Service:**

18 I certify that I caused the Consent Motion for Extension of Time to be served today, July  
19 18, 2023, by CMECF to Blaine T. Welsh, and L. Jamala Edwards, who are filing users of the  
20 CM/ECF system.  
21

22 /s/Hal Taylor  
23 Hal Taylor  
24

25 **ORDER**

26 **IT IS SO ORDERED**

27 **DATED:** 9:04 am, July 19, 2023

28 

**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**